

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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PRISON HEALTH SERVICES, INC.,

Plaintiff,

v.

EMRE UMAR

and

CORRECTIONAL MEDICAL  
CARE, INC.,

Defendants.

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CIVIL ACTION

NO. 02-CV-2642

ANSWER OF DEFENDANT  
CORRECTIONAL MEDICAL CARE, INC. TO  
PLAINTIFF'S MOTION TO AMEND THE COMPLAINT

Defendant Correctional Medical Care, Inc. ("CMC") denies the allegations set forth in plaintiff's Motion to Amend the Complaint and denies that plaintiff should be entitled to amend its Complaint. The basis for these denials and the reasons why plaintiff's Motion should be denied are set forth in the accompanying Memorandum, which is incorporated by reference.

WOLF, BLOCK, SCHORR & SOLIS-COHEN LLP

DATED: December 2, 2002

BY: \_\_\_\_\_  
LARRY H. SPECTOR  
MICHAEL D. LIPUMA  
1650 Arch Street  
Philadelphia, PA 19103-2097  
215-977-2000  
COUNSEL FOR DEFENDANT  
CORRECTIONAL MEDICAL CARE, INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT ON December 2, 2002, a copy of the foregoing document, together with all supporting papers, is being served by hand delivery on Michael Homans, Esq., Mager, White & Goldstein, One Liberty Place, 21st Floor, Philadelphia, PA 19103, and by fax upon Francis Clark, Esquire, 987 Old Eagle School Road, Suite 705, Wayne, PA 19087.

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Michael D. LiPuma